

EXHIBIT 5

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
 555 California Street, Suite 2700
 San Francisco, CA 94104
 Telephone: (415) 439-1625
 laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
 2005 Market Street, Suite 1000
 Philadelphia, PA 19103
 Telephone: (215) 268-5000
 alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
 601 Lexington Avenue
 New York, NY 10022
 Telephone: (212) 446-4800
 jessica.davidson@kirkland.com

Attorneys for Defendants
 UBER TECHNOLOGIES, INC., RASIER, LLC,
 And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**DEFENDANTS UBER TECHNOLOGIES,
 INC., RASIER, LLC, AND RASIER-CA.
 LLC'S INITIAL TRIAL EXHIBIT LIST**

This Document Relates to:

*Jaylynn Dean v. Uber Technologies, Inc., et
 al.*, No. 3:23-cv-06708

Judge: Hon. Charles R. Breyer
 Courtroom: 6 – 17th Floor

Defendants Uber Technologies, Inc.; Rasier, LLC; and Rasier-CA, LLC (together, “Uber” or “Defendants”) hereby submit the initial exhibit list, attached hereto as Exhibit 1, in this matter. Defendants reserve the right to amend and/or supplement their initial exhibit list based on supplementation pursuant to Rule 26(e) and/or agreements between the parties, Plaintiff’s initial exhibit list, and the evidence presented at trial. The fact that an exhibit appears on this list is not to be construed as a waiver by

Defendants of any objections they may have as to the admissibility of the exhibit or confidentiality.

Defendants reserve all rights.

DATED: December 10, 2025

Respectfully submitted,

/s/ Laura Vartain Horn

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com

Attorneys for Uber
UBER TECHNOLOGIES, INC.,
RASIER, LLC, And RASIER-CA, LLC

Exhibit 1

Jaylynn Dean v. Uber Technologies, Inc., et al.,
No. 3:23-cv-06708

Uber's Initial Exhibit List – 12/10/2025

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
001	2/12/2014	Email thread re: Blog Post Copy - Background check	UBER_JCCP_MDL_001866326	UBER_JCCP_MDL_001866328	
002	12/4/2014	Email thread re: Partnerships	UBER_JCCP_MDL_001074974	UBER_JCCP_MDL_001074977	
003	1/12/2015	Email thread re: Ideas for Uber Safety	UBER_JCCP_MDL_001074064	UBER_JCCP_MDL_001074064	
004	1/12/2015	Email thread re: Example flaws in the State Criminal BGC system	UBER_JCCP_MDL_001074062	UBER_JCCP_MDL_001074063	
005	2/6/2015	Safety Incident Reporting	UBER_JCCP_MDL_001100384	UBER_JCCP_MDL_001100390	
006	2/17/2015	RAINN & Uber Services Agreement	UBER_JCCP_MDL_001100605	UBER_JCCP_MDL_001100609	
007	3/9/2015	Safety Update PowerPoint	UBER_JCCP_MDL_001776098	UBER_JCCP_MDL_001776098	
008	3/13/2015	Email thread re: West Coast Region RAINN Training	UBER_JCCP_MDL_000002750	UBER_JCCP_MDL_000002750	
009	3/27/2015	Email from H. Bailey to P. Cardenas re: Thanks	UBER_JCCP_MDL_000017951	UBER_JCCP_MDL_000017951	
010	7/15/2015	Details on Safety Request a Ride with Uber	N/A	N/A	
011	12/11/2015	Rasier Technology Services Agreement	UBER000003849	UBER000003869	
012	4/12/2016	Newsroom Article, "Unveiling Uber's Transparency Report"	N/A	N/A	
013	6/16/2016	Email thread re: All Hands Cultural Value Callouts	UBER_JCCP_MDL_003376726	UBER_JCCP_MDL_003376727	
014	7/11/2016	T&S Ops. Development A/V Monitoring PowerPoint	UBER_JCCP_MDL_000121333	UBER_JCCP_MDL_000121382	
015	8/1/2016	Preliminary Explanatory Analysis	UBER_JCCP_MDL_000323562	UBER_JCCP_MDL_000323562.0011	
016	8/11/2016	A/V South Africa Analysis August 2016 PowerPoint (Modified 7/9/2019)	UBER_JCCP_MDL_005376633	UBER_JCCP_MDL_005376633	
017	9/1/2016	Trust & Safety Strategy Update September 2016 Powerpoint	UBER_JCCP_MDL_001102286	UBER_JCCP_MDL_001102341	
018	1/1/2017	Uber Community Guidelines	UBER_JCCP_MDL_000245891	UBER_JCCP_MDL_000245891.006	
019	2/21/2017	Dolby Security Perceptions Usability Test Report PowerPoint (Modified 10/2/2018)	UBER_JCCP_MDL_000477352	UBER_JCCP_MDL_000477468	
020	6/13/2017	Email from J. Purcell re: National Sexual Assault Convention Summary	UBER_JCCP_MDL_000425365	UBER_JCCP_MDL_000425366	
021	11/8/2017	Sexual Misconduct Taxonomy Project Business Proposal (Modified 3/8/2019)	UBER_JCCP_MDL_000007717	UBER_JCCP_MDL_000007718	
022	4/4/2018	Safety & Insurance All Hands Powerpoint	UBER_JCCP_MDL_000501770	UBER_JCCP_MDL_000501802	
023	4/12/2018	Black Box Rider perception in Mexico PowerPoint (Modified 2/12/2019)	UBER_JCCP_MDL_002095454	UBER_JCCP_MDL_002095454	
024	11/7/2018	S4S Executive Committee PowerPoint presentation	UBER_JCCP_MDL_000250672	UBER_JCCP_MDL_000250672.0047	
025	11/10/2018	S-RAD Performance Overview PowerPoint presentation	UBER_JCCP_MDL_002266899	UBER_JCCP_MDL_002266917	
026	11/20/2018	Dashcam Platform (Modified 3/12/2020)	UBER_JCCP_MDL_000505111	UBER_JCCP_MDL_000505133	
027	12/5/2018	On-Trip Audio Recording (Modified 8/29/2023)	UBER_JCCP_MDL_000515739	UBER_JCCP_MDL_000515760	
028	3/13/2019	Statement of Work – Business Proposal: NSVRC Re-Engagement	UBER_JCCP_MDL_000118025	UBER_JCCP_MDL_000118027	
029	2/14/2019	Lessons from taxonomy implementation PowerPoint	UBER000142692	UBER000142709	
030	3/21/2019	Safety@Uber March 2019 #standforsafety PowerPoint presentation	UBER_JCCP_MDL_000199968	UBER_JCCP_MDL_000200032	
031	4/17/2019	Email thread re: Tweet by Amir Talai on Twitter	UBER_JCCP_MDL_005268633	UBER_JCCP_MDL_005268634	
032	9/4/2019	S-RAD Safety Public Policy & Comms PowerPoint presentation	UBER_JCCP_MDL_002621537	UBER_JCCP_MDL_002621550	
033	10/8/2019	Email thread re: IRT Training and Project Updates	UBER_JCCP_MDL_000269342	UBER_JCCP_MDL_000269343	
034	10/15/2019	Safety Advisory Board October 15th Meeting - Safety Report	UBER_JCCP_MDL_001114443	UBER_JCCP_MDL_001114447	
035	10/22/2019	Stand for Safety Program Review PowerPoint	UBER_JCCP_MDL_001731269	UBER_JCCP_MDL_001731375	
036	10/22/2019	Stand for Safety Program Review PowerPoint presentation	UBER_JCCP_MDL_000562664	UBER_JCCP_MDL_000562664.0016	
037	10/30/2019	Safety Risk Assessed Dispatch (S-RAD) US Central Ops: Operating Review PowerPoint presentation	UBER_JCCP_MDL_002001850	UBER_JCCP_MDL_002001871	
038	11/13/2019	Women Driving Women Product PowerPoint presentation	UBER_JCCP_MDL_000706499	UBER_JCCP_MDL_000706502	
039	11/15/2019	Email thread re: Safety Report - Policy Update	UBER_JCCP_MDL_000535001	UBER_JCCP_MDL_000535003	
040	12/5/2019	2017-2018 U.S. Safety Report	UBER000001302	UBER000001385	
041	12/6/2019	Email thread re: Our first US Safety Report	UBER_JCCP_MDL_000002717	UBER_JCCP_MDL_000002718	

* Defendants will renumber their exhibits after the parties agree on a numbering convention.

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
042	12/20/2019	Email thread re: [Time Sensitive] Update for Gus	UBER_JCCP_MDL_000914068	UBER_JCCP_MDL_000914070	
043	12/29/2019	Email from D Khosrowshahi to S. Kansal re: Work to be proud of	UBER_JCCP_MDL_005256905	UBER_JCCP_MDL_005256906	
044	1/6/2020	Email from T. Breeden to B. Anderson re: training in PHX	UBER_JCCP_MDL_000304641	UBER_JCCP_MDL_000304642	
045	2/14/2020	Dashcam Strategy, December 2018 PowerPoint (Modified 2/14/2020)	UBER_JCCP_MDL_000505173	UBER_JCCP_MDL_000505260	
046	2/24/2020	Email thread re: Uber Gemini Testing Plan & Feedback	UBER_JCCP_MDL_000082337	UBER_JCCP_MDL_000082338	
047	4/15/2020	Safety Advisory Board PowerPoint presentation	UBER_JCCP_MDL_002618591	UBER_JCCP_MDL_002618591	
048	5/28/2020	Dashcam Update, June 2020 PowerPoint (Modified 5/19/2021)	UBER_JCCP_MDL_000261329	UBER_JCCP_MDL_000261377	
049	6/1/2020	Women Rider Preferred // Policy Playbook	UBER_JCCP_MDL_000960287	UBER_JCCP_MDL_000960297	
050	7/6/2020	Dashcams and Audio Recordings Policy Backgrounder and Talking Points	UBER_JCCP_MDL_000122796	UBER_JCCP_MDL_000122796.0008	
051	8/8/2020	Email thread re: Fortune - Driver Safety Education Article	UBER_JCCP_MDL_000130927	UBER_JCCP_MDL_000130928	
052	8/13/2020	Email thread re: Driver SA/SM Education pilot launched in four cities!	UBER_JCCP_MDL_000059387	UBER_JCCP_MDL_000059389	
053	10/5/2019	Dashcam Update Oct 2019 PowerPoint	UBER_JCCP_MDL_000509993	UBER_JCCP_MDL_000510108	
054	12/14/2020	S-RAD Phase 7 Ongoing Experiment Results PowerPoint presentation	UBER_JCCP_MDL_005584353	UBER_JCCP_MDL_005584353	
055	1/14/2021	Safety Risk Assessed Dispatch (S-RAD) PowerPoint presentation	UBER_JCCP_MDL_003224079	UBER_JCCP_MDL_003224079	
056	2/1/2021	Framework for City Selection	UBER_JCCP_MDL_000160233	UBER_JCCP_MDL_000160271	
057	3/22/2021	Talking Points re: Dashcams and Audio Recordings	UBER_JCCP_MDL_000125622	UBER_JCCP_MDL_000125628	
058	3/22/2021	Safety Media (Modified 9/16/2021)	UBER000145724	UBER000145730	
059	4/8/2021	S-RAD US Launch presentation speaker notes	UBER_JCCP_MDL_002620849	UBER_JCCP_MDL_002620855	
060	4/8/2021	New Safety Features summary and response plan	UBER_JCCP_MDL_000122399	UBER_JCCP_MDL_000122399.0005	
061	4/12/2021	Stand for Safety Program Review PowerPoint presentation	UBER_JCCP_MDL_000503752	UBER_JCCP_MDL_000503752.0065	
062	4/28/2021	Email thread re: WRP in Canada?	UBER_JCCP_MDL_005471213	UBER_JCCP_MDL_005471215	
063	7/8/2021	S-RAD Weekly Update PowerPoint presentation	UBER_JCCP_MDL_002400835	UBER_JCCP_MDL_002400859	
064	7/19/2021	Safety at Uber PowerPoint presentation	UBER_JCCP_MDL_000502326	UBER_JCCP_MDL_000502326.0044	
065	8/25/2021	U.S. BYOD Analysis December 2021 PowerPoint (Modified 10/10/2023)	UBER_JCCP_MDL_000518671	UBER_JCCP_MDL_000518675	
066	10/2/2021	Email from L. Savoldi re: Dashcam Weekly Update - Oct 2, 2021	UBER000149547	UBER000149550	
067	10/20/2021	Lyft's Community Safety Report	N/A	N/A	
068	2/10/2022	[PRD] In App Video Recording (Modified 10/10/2023)	UBER_JCCP_MDL_000515681	UBER_JCCP_MDL_000515705	
069	4/21/2022	FAQ for MTR	UBER_JCCP_MDL_002340895	UBER_JCCP_MDL_002340907	
070	4/22/2022	US Audio Recording Pilot Expansion 1.0 Comms Plan (Modified 3/31/2023)	UBER-MDL3084-000078453	UBER-MDL3084-000078460	
071	6/10/2022	Stand for Safety Program Review - ELT PowerPoint presentation	UBER_JCCP_MDL_001730324	UBER_JCCP_MDL_001730324	
072	7/1/2022	Email from M. Kluger re: Safety Media Bi-Weekly Update -July 1, 2022	UBER000148075	UBER000148078	
073	7/29/2022	Email from M. Kluger re Safety Media Bi-Weekly Update -July 29, 2022	UBER_JCCP_MDL_000366937	UBER_JCCP_MDL_000366940	
074	9/6/2022	In App Video Recording Driver Team Check In PowerPoint (Modified 10/20/2022)	UBER000178321	UBER000178336	
075	9/7/2022	Program Charter: Safety Marketplace Insights	UBER_JCCP_MDL_003415463	UBER_JCCP_MDL_003415467	
076	10/11/2022	Email thread re: Women Rider Preference - US Context	UBER_JCCP_MDL_003375025	UBER_JCCP_MDL_003375032	
077	10/27/2022	Email thread re: [Pilot launch announcement] In-app Video Recording in US, MX and BR	UBER_JCCP_MDL_000437220	UBER_JCCP_MDL_000437223	
078	1/12/2023	Recording Update January 2023 PowerPoint (Modified 5/24/2023)	UBER_JCCP_MDL_000516118	UBER_JCCP_MDL_000516179	
079	1/27/2023	Uber Global Serious Interpersonal Conflict Standard	UBER_JCCP_MDL_000366728	UBER_JCCP_MDL_000366743	
080	4/13/2023	Email thread re Record my Ride Android Launch	UBER_JCCP_MDL_000366908	UBER_JCCP_MDL_000366909	
081	9/6/2023	Talking Points - In App Video Recording - Expansion and Ony on Uber Readiness	UBER_JCCP_MDL_000148952	UBER_JCCP_MDL_000148961	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
082	9/12/2023	S-RAD Canada Expansion	UBER_JCCP_MDL_002297004	UBER_JCCP_MDL_002297011	
083	9/27/2023	October MTD REcording Update Talking Points FAQ	UBER_JCCP_MDL_000148941	UBER_JCCP_MDL_000148951	
084	11/3/2023	S-RAD Monthly Update PowerPoint presentation	UBER_JCCP_MDL_002333724	UBER_JCCP_MDL_002333724	
085	12/1/2023	S-RAD Leadership Update PowerPoint presentation	UBER_JCCP_MDL_001461771	UBER_JCCP_MDL_001461771.0638	
086	12/11/2023	Introduction to S-RAD Safety Risk Assessed Dispatch PowerPoint presentation	UBER_JCCP_MDL_003602459	UBER_JCCP_MDL_003602459	
087	12/12/2023	Audio Recording Impact Analysis - U.S. Drivers March 2024 PowerPoint (Modified 10/2/2024)	UBER_JCCP_MDL_003036204	UBER_JCCP_MDL_003036243	
088	2/28/2024	Women Earners US Women Preferences PowerPoint presentation	UBER_JCCP_MDL_003272500	UBER_JCCP_MDL_003272568	
089	6/20/2024	Women Preferences PowerPoint presentation	UBER_JCCP_MDL_003045480	UBER_JCCP_MDL_003045547	
090	7/30/2024	RideCheck Holdout Group, Safety Effectiveness Measurement PowerPoint (Modified 10/24/2024)	UBER_JCCP_MDL_003019132	UBER_JCCP_MDL_003019132	
091	9/3/2024	WOMEN RIDER PREFERENCE - US External Stakeholder Engagement Policy Plan (2024-2025)	UBER_JCCP_MDL_003609680	UBER_JCCP_MDL_003609684	
092	9/9/2024	[PRD] S-RAD 2.0	UBER_JCCP_MDL_003304037	UBER_JCCP_MDL_003304045	
093	2020-2022	Lyft's Safety Transparency Report (2020-2022)	N/A	N/A	
094	2023	Introduction to S-RAD Safety Risk Assessed Dispatch PowerPoint presentation	UBER_JCCP_MDL_003503729	UBER_JCCP_MDL_003503780	
095	10/15/2024	Safety Risk Assessed Dispatch (SRAD) PowerPoint presentation	UBER_JCCP_MDL_002260211	UBER_JCCP_MDL_002260211.0034	
096	6/27/218	Email chain re: Q2 Safety Comms Highlights	UBER_JCCP_MDL_000185310	UBER_JCCP_MDL_000185313	
097	10/17/2017	Uber Community Guidelines	UBER_JCCP_MDL_001534606	UBER_JCCP_MDL_001534620	
098	11/20/2023	Helping Industries Classify Reports of Sexual Harassment, Sexual Misconduct and Sexual Assault Document	UBER000001197	UBER000001249	
099	9/12/2023	Women Driving Women: Analysis and Recommendations	UBER_JCCP_MDL_000518601	UBER_JCCP_MDL_000518601.0018	
100	8/27/2021	Code of Conduct	UBER000000566	UBER000000567	
101	11/3/2017	Email from K. Parker re: "[URGENT] Dara request on video safety advice - need brand input"	UBER_JCCP_MDL_000563470	UBER_JCCP_MDL_000563474	
102	4/10/2019	Andrew Product Portfolio PowerPoint	UBER_JCCP_MDL_005176144	UBER_JCCP_MDL_005176144	
103	11/26/2022	Future of VIP Review PowerPoint	UBER000177527	UBER000177564	
104	7/2012-11/2024	Number of Completed Trips in the United States by Month from July 2012 to November 2024	N/A	N/A	
105	3/31/2022	Uber's Emergency Button and The Technologies Behind It	UBER_JCCP_MDL_001987292	UBER_JCCP_MDL_001987301	
106	3/14/2021	Safety over the years PowerPoint	UBER_JCCP_MDL_000008096	UBER_JCCP_MDL_000008115	
107	5/18/2021	Alpha Test	UBER_JCCP_MDL_002002834	UBER_JCCP_MDL_002002835	
108	10/20/2021	Uber Community Guidelines	UBER000000788	UBER000000800	
109	9/19/2022	Uber Community Guidelines	UBER-MDL3084-000366987	UBER-MDL3084-000366999	
110	10/11/2023	Uber Community Guidelines	UBER-MDL3084-000367000	UBER-MDL3084-000367004	
111	4/14/2023	Rider Communication re: My driver refused my destination	UBER-MDL3084-DFS00216725	UBER-MDL3084-DFS00216727	
112	3/24/2019	Rider Communication re: My driver was rude	UBER-MDL3084-DFS00216657	UBER-MDL3084-DFS00216657	
113	8/25/2025	Additional Information Requested From 8/25 Deposition of Greg Brown	N/A	N/A	
114	12/5/2019	Email from E. Robinson re: RAINN Statement on Uber's safety Report	RAINN UberMDL_0001637	RAINN UberMDL_0001637	
115	12/19/2014	Email chain re: Safety idea	UBER_JCCP_MDL_001074706	UBER_JCCP_MDL_001074706	
116	12/14/2014	Email chain re: Sharing Safety Ideas	UBER_JCCP_MDL_001074813	UBER_JCCP_MDL_001074814	
117	7/31/2017	Email chain re: H2 Safety & Insurance Goals	UBER_JCCP_MDL_000128116	UBER_JCCP_MDL_000128117	
118	7/5/2017	Safety & Insurance All Hands PowerPoint (Modified 9/6/2017)	UBER_JCCP_MDL_000478082	UBER_JCCP_MDL_000478121	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
119	9/22/2017	Email chain re: Rider Forward Safety List 1	UBER_JCCP_MDL_000317461	UBER_JCCP_MDL_000317462	
120	1/16/2024	Module #1 - Respecting Privacy	UBER_JCCP_MDL_005251339	UBER_JCCP_MDL_005251339	
121	6/17/2019	Module #2 - Respecting Personal Space Video (FINAL ProRes)	UBER_JCCP_MDL_005784101	UBER_JCCP_MDL_005784101	
122	4/5/2024	Module #3 - Respecting Personal Space	UBER_JCCP_MDL_005784105	UBER_JCCP_MDL_005784105	
123	4/5/2024	Module #4 - Sexual Violence Awareness	UBER_JCCP_MDL_005784107	UBER_JCCP_MDL_005784107	
124	1/16/2024	Module #5 - Bystander Intervention	UBER_JCCP_MDL_005784110	UBER_JCCP_MDL_005784110	
125	4/2/2018	The Preventive Effect of Surveillance Camera in Cars on Crime - external literature	UBER_JCCP_MDL_000258931	UBER_JCCP_MDL_000258934	
126	1/9/2020	Comments on a Privacy Advocate Presentation on video and audio recordings for safety	UBER_JCCP_MDL_000111572	UBER_JCCP_MDL_000111573	
127	1/10/2020	PowerPoint - Rideshare recordings for safety	UBER_JCCP_MDL_000156678	UBER_JCCP_MDL_000156772	
128	9/16/2021	Uber Policy Document - Worker Classification	UBER_JCCP_MDL_000414756	UBER_JCCP_MDL_000414798	
129	11/17/2023	Readout of S-RAD Monthly Update with Gus	UBER_JCCP_MDL_002340865	UBER_JCCP_MDL_002340871	
130	10/9/2023	Uber Experiment Readout - S-RAD Enforced Downranking Baseline Experiment	UBER_JCCP_MDL_002622051	UBER_JCCP_MDL_002622064	
131	3/9/2023	[Abstract] S-RAD Enforced Downranking	UBER_JCCP_MDL_003501039	UBER_JCCP_MDL_003501047	
132	2/14/2023	S-RAD Intervention-Enforced Downranking	UBER_JCCP_MDL_002340620	UBER_JCCP_MDL_002340627	
133	10/18/2022	PowerPoint - US production model feature importance - Top 20 features	UBER_JCCP_MDL_005784097	UBER_JCCP_MDL_005784097	
134	10/2/2023	Baseline SRAD global model	UBER_JCCP_MDL_002058117	UBER_JCCP_MDL_002058117	
135	10/10/2023	PowerPoint - Baseline S-RAD global model	UBER_JCCP_MDL_005025910	UBER_JCCP_MDL_005025910	
136	1/10/2020	PowerPoint - Rideshare recordings for safety	UBER_JCCP_MDL_000122176	UBER_JCCP_MDL_000122270	
137	9/19/2020- 2/9/2023	Log of Courses sent to H. Turay	UBER-MDL3084-BW-00054160	UBER-MDL3084-BW-00054160	
138	6/30/2022	2019-2020 US Safety Report	UBER_JCCCP_MDL_001738656	UBER_JCCCP_MDL_001738656.0077	
139	Undated	2021-2022 US Safety Report	UBER_JCCP_MDL_003561529	UBER_JCCP_MDL_003561561	
140	Various	Uber's website over time	N/A	N/A	
141	2017-2024	Uber Incident Report Classification of Dominant Tickets for 2017–2024 (Flack Data)	N/A	N/A	
142	2023-2024	Uber Incident Report Classification for 2023–24	N/A	N/A	
143	12/24/2024	AC Transit Survey Excel Spreadsheet, https://www.actransit.org/sites/default/files/2024-12/AC%20Transit%20Safety%20Survey_All%20Results_EXTERNAL%20final%2012.24.24.xlsx	N/A	N/A	
144	2022	Arizona Revised Statute § 28-9551-9558	N/A	N/A	
145	2014	Arizona Revised Statute §41-2097	N/A	N/A	
146	2015	Assembly Bill 1422 (Cooper) (2015). See http://www.leginfo.ca.gov/pub/15-16/bill/asm/ab_1401-1450/ab_1422_bill_20151011_chaptered.html	N/A	N/A	
147	2014	AZ HB 2262 (2014) https://legiscan.com/AZ/text/HB2262/2014	N/A	N/A	
148	2015	AZ HB 2135 (2015) https://legiscan.com/AZ/text/HB2135/2015	N/A	N/A	
149	7/16/1905	“BART Street Harassmen Survey Results2024,” https://www.bart.gov/sites/default/files/2024-11/BARTStreetHarassmenSurveyResults2024.xlsx	N/A	N/A	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
150	4/15/2024	Bloomberg Second Measure, “Uber vs. Lyft: Who’s Tops in The Battle of U.S. Rideshare Companies,” Bloomberg Second Measure, April 15, 2024, https://secondmeasure.com/datapoints/rideshare-industry-overview/ .	N/A	N/A	
151	2014	California Assembly Bill 2293 (Bonilla), http://www.leginfo.ca.gov/pub/13-14/bill/asm/ab_2251-2300/ab_2293_bill_20140917_chaptered.html .	N/A	N/A	
152	7/27/2023	California SB 434 Public Transit for All: Improving Safety and Increasing Ridership,” Senator Dave Min, July 27, 2023, https://noplacforhateca.org/SB_434_(Min)_Ridership_Safety_Fact_Sheet_2023.07.27.pdf .	N/A	N/A	
153	10/7/2023	California Bill Text: CA SB434, LegiScan, Bill Text: CA SB434, https://legiscan.com/CA/text/SB434/id/2840255	N/A	N/A	
154	Undated	CDC, “Assault or Homicide,” National Center for Health Statistics, https://www.cdc.gov/nchs/fastats/homicide.htm	N/A	N/A	
155	Undated	CDC, “Accidents or Unintentional Injuries,” National Center for Health Statistics, https://www.cdc.gov/nchs/fastats/accidental-injury.htm	N/A	N/A	
156	4/16/2024	“Lightning and Your Safety,” U.S Center for Disease Control and Prevention, https://www.cdc.gov/lightning/about/index.html	N/A	N/A	
157	Various	California Public Utilities Comm’n, CPUC Decisions and Orders	N/A	N/A	
158	3/0/2020	Crime and Harassment on Public Transportation: A Survey of SJSU Students Set in International Context, Mineta Transportation Institute, Report 20-09	N/A	N/A	
159	2024	ETC Institute, Transit Safety Survey Findings Report, Fall 2024	N/A	N/A	
160	2024	Federal Bureau of Investigation. (2024). Uniform Crime Reporting Program. U.S. Department of Justice	N/A	N/A	
161	2010	Felson, M., & Boba, R. L. (Eds.). (2010). Crime and everyday life. SAGE Publications	N/A	N/A	
162	11/19/2025	Forbes - Gassam, Janice, "Male Drivers Have Filed A Gender Discrimination Lawsuit Against Rideshare Apps: Here’s What To Know"	N/A	N/A	
163	7/2/2025	FRED - “Population, Total for United States,” Federal Reserve Bank of St. Louis – FRED https://fred.stlouisfed.org/series/POPTOTUSA647NWDB	N/A	N/A	
164	2023	Ghoshal, M. et al., Performance of Cellular Networks on the Wheels, IMC '23 October 24-26, 2023 Montrea, Q Canada	N/A	N/A	
165	2017	Greenwood, B. N., & Wattal, S. (2017). Show me the way to go home: Ridesharing and drunk driving fatalities. Information Systems Research, 28(3), 574–588	N/A	N/A	
166	Undated	Institute for the Wierles Internet of Things, https://wiot.northeastern.edu/news/performance-of-cellular-networks-on-wheels/#:~:text=The%20measurement%20dataset%20is%20publicly,(KPIs)%20on%20network%20performance.	N/A	N/A	
167	3/11/2021	Klar, Rebecca, Uber, Lyft to share information on drivers banned for ‘most serious safety incidents, The Hill, https://thehill.com/policy/technology/542826-uber-lyft-to-shareinformation-drivers-banned-for-most-serious-safety/	N/A	N/A	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
168	2/3/2025	Long Beach Transit Safety Survey Final Report, ETC Institute, February 3, 2025	N/A	N/A	
169	3/0/2025	Los Angeles County Metropolitan Transportation Authority: Street Harassment Survey and Focus Groups, Metro	N/A	N/A	
170	12/16/2024	LADOT Safety & Security Survey Findings and Recommendations, Ilium, December 16, 2024.	N/A	N/A	
171	Undated	Lyft Community Guidelines	N/A	N/A	
172	10/20/2021	Lyft's Community Safety Report	N/A	N/A	
173	7/11/2024	Lyft's Safety Transparency Report (2020–2022)	N/A	N/A	
174	7/12/1905	MMPI-3 Manuel	N/A	N/A	
175	11/13/2025	Mashable - DiBenedetto, Chase "Uber, Lyft face lawsuits from male drivers, claiming discrimination"	N/A	N/A	
176	12/19/2024	OCTA Rider Safety Perception Survey Results.csv, Orange County Transportation Authority, December 19, 2024	N/A	N/A	
177	11/4/2016	Okpaku, Joseph, Our Commitment to Our Community, https://medium.com/@joe_o_65233/ourcommitment-to-our-community-7cd62ce3ec29	N/A	N/A	
178	7/30/2018	Okpaku, Joseph, New Rules Takes Us Backwards, https://medium.com/@joseph_1168/new-ruleswill-take-us-backwards-efc79f81f4da	N/A	N/A	
179	Undated	RAINN, Facts & Statistics: The Scope of the Problem. https://rainn.org/get-informed/facts-statistics-the-scope-of-the-problem/	N/A	N/A	
180	8/28/2025	RAINN - Tips for Rideshare Drivers	N/A	N/A	
181	2018	RALIANCE, Urban Institute, and Uber, Helping Industries to Classify Reports of Sexual Harassment, Sexual Misconduct, and Sexual Assault	N/A	N/A	
182	12/31/2024	Sacramento Regional Transit (SacRT) Street Harassment Outreach Summary, AECOM, December 31, 2024, Appendix A.	N/A	N/A	
183	1/7/2022	Safer Places, Inc. Launches Transportation Division	N/A	N/A	
184	2/21/2021	SFMTA Become a Taxi Driver (Updated Feb. 21, 2021) (https://www.sfmta.com/gettingaround/taxi/become-taxi-driver)	N/A	N/A	
185	2024	SFMTA 2024 Phase 1 Muni Rider Safety and Harassment Data	N/A	N/A	
186	1/2006	Schaller Consulting Archive, Taxi Fares in Major U.S. Cities (Updated Jan. 2006), http://www.schallerconsult.com/taxi/fares1.htm	N/A	N/A	
187	2018	Shokoohyar, Sina, Ride-sharing platforms from drivers' perspective: Evidence from Uber and Lyft drivers, International Journal of Data and Network Science 2 (2018), https://growingscience.com/ijds/Vol2/ijdns_2018_12.pdf , pp. 90-1	N/A	N/A	
188	5/31/2016	U.S. Department of Justice, Female Victims of Sexual Violence, 1994–2010, Office of Justice Programs, Bureau of Justice Statistics	N/A	N/A	
189	7/5/2023	U.S. Department of Justice, Criminal Victimization, 2021, Office of Justice Programs, Bureau of Justice Statistic	N/A	N/A	
190	2/0/2024	United States Government Accountability Office Report to Congressional Addressees, RIDESHARING AND TAXI SAFETY: Information on Assaults against Drivers and Passengers	N/A	N/A	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
191	12/13/2022	Upwork, Freelance Forward 2022 https://www.upwork.com/research/freelanceforward-2022	N/A	N/A	
192	2024	VTa Safety and Harassment Survey, Santa Clara Valley Transportation Authority and EMC Research, July–August 2024	N/A	N/A	
193	2020	Wolters, L. and M. Smith, “Sexual Violence Against Female College Students in the United States,” Ballard Brief at BYU, Spring 2020, https://ballardbrief.byu.edu/issue-briefs/sexual-violence-against-female-collegestudents-in-the-united-states .	N/A	N/A	
194	2011	Wong, B., “Simplify to Clarify,” Nature Methods, 8, 8, p. 611	N/A	N/A	
195	Undated	World Health Organization “Coronavirus Disease (COVID-19) Pandemic,” https://www.who.int/europe/emergencies/situations/covid-19	N/A	N/A	
196	2024	Worthen, M. G. F. and C. Schleifer (2024), “#MeToo and Sexual Violence Reporting in the National Crime Victimization Survey,” Journal of Interpersonal Violence, 39, 21-22, pp. 4215–4259	N/A	N/A	
197	2017	Wyman, K.M., Taxi Regulation in the Age of Uber, 20 N.Y.U. J. Legis. & Pub. Pol’y 1	N/A	N/A	
198	4/6/2019	Campaigns of the World, Uber - Safety Never Stops, innovative safety video	N/A	N/A	
199	11/8/2025	Male Drivers Sue Uber and Lyft For Sex Discrimination Over Women-Only Ride-Hailing Feature, Time, https://time.com/7332356/uber-lawsuit-sex-discrimination-lyft/	N/A	N/A	
200	11/19/2025	Male Drivers Have Filed A Gender Discrimination Lawsuit Against Rideshare Apps: Here’s What To Know, Forbes, https://www.forbes.com/sites/janicegassam/2025/11/19/male-drivers-have-filed-a-gender-discrimination-lawsuit-against-rideshare-apps-heres-what-to-know/	N/A	N/A	
201	11/13/2025	Uber, Lyft face lawsuits from male drivers, claiming discrimination, Mashable, https://mashable.com/article/uber-lyft-lawsuit-male-driver-discrimination	N/A	N/A	
202	11/15/2023	Jaylynn Dean Ride Receipt and Report Communication with Uber	BW-DEAN_JAYLYNN_000001	BW-DEAN_JAYLYNN_000080	
203	Various	Dean medical records obtained from Amarillo Pediatric Clinic and Texas Tech Physicians	BW-DEAN_JAYLYNN_000090	BW-DEAN_JAYLYNN_000186	
204	Undated	Driver H. Turay Text re: Apology	BW-DEAN_JAYLYNN_000412	BW-DEAN_JAYLYNN_000412	
205	Various	Screenshots of various text messages, Uber App notifications	BW-Dean_Jaylynn_00081	BW-Dean_Jaylynn_00085	
206	12/19/2016	CHECKR Email to Driver H. Turay re Adverse Report	CHECKR000891	CHECKR000893	
207	12/22/2016	CHECKR and Driver H. Turay Call Receipt	CHECKR000894	CHECKR000894	
208	3/12/2025	Chandler Police Department Affidavit	Confidential-Attorney Eyes Only-JDean-CPD-000001	Confidential-Attorney Eyes Only-JDean-CPD-000001	
209	Various	Tempe Police Department Records Compilation	Confidential-Attorney Eyes Only-JDean-TempePD-000001	Confidential-Attorney Eyes Only-JDean-TempePD-000086	
210	6/27/2025	Tempe Police Department Records Request	Confidential-Attorney Eyes Only-JDean-TempePD-000088	Confidential-Attorney Eyes Only-JDean-TempePD-000088	
211	3/18/2025	Jaylynn Dean Interview Video	Confidential-Attorney Eyes Only-JDean-TempePD-000095	Confidential-Attorney Eyes Only-JDean-TempePD-000095	
212	11/15/2023	Uber App - Driver profile / route video	Confidential-Attorney Eyes Only-JDean-TempePD-000097	Confidential-Attorney Eyes Only-JDean-TempePD-000097	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
213	Various	Jaylynn Dean Social Media Compilation	CONFIDENTIAL-BW-DEAN JAYLYNN S.M. 000001	CONFIDENTIAL-BW-DEAN JAYLYNN S.M. 000248	
214	Various	Jaylynn Dean Social Media Compilation	CONFIDENTIAL-BW-DEAN JAYLYNN S.M. 000249	CONFIDENTIAL-BW-DEAN JAYLYNN S.M. 000857	
215	Undated (Around 11/16/2023)	Video recording phone call with Dean MP4	CONFIDENTIAL-BW-DEAN_Scott_McLaughlin_000001	CONFIDENTIAL-BW-DEAN_Scott_McLaughlin_000001	
216	Undated (Around 11/16/2023)	Video recording phone call with Dean MP4	CONFIDENTIAL-BW-DEAN_Scott_McLaughlin_000002	CONFIDENTIAL-BW-DEAN_Scott_McLaughlin_000002	
217	Undated	Text Messages Screenshot	JDean-PPR-000001	JDean-PPR-000009	
218	Various	Various screenshots with Ride Receipt, Uber Comms, Life360 Data, Police Reports, medical records obtained Honor Health Medical Records and Tempe Police Reports	JDean-PPR-000010	JDean-PPR-000089	
219	Various	Dean medical records obtained from Amarillo Pediatric Clinic and Texas Tech Physicians	JDean-PPR-000209	JDean-PPR-000278	
220	Various	Tempe Police Subpoena and Reports	JDean-TempePD-000001	JDean-TempePD-000086	
221	6/12/2025	Tempe PD Bah and Lopez photos	JDean-TempePD-000087	JDean-TempePD-000087	
222	7/8/2025	Tempe PD Body Cam Footage of talkk with Dean	JDean-TempePD-000089	JDean-TempePD-000089	
223	11/15/2023	Bodycam footage of interview with hotel clerk.	JDean-TempePD-000090	JDean-TempePD-000090	
224	7/8/2025	Tempe PD Body Cam Footage of walk around hotel	JDean-TempePD-000091	JDean-TempePD-000091	
225	7/8/2025	Tempe PD Body Cam Footage of talk about Turay call	JDean-TempePD-000092	JDean-TempePD-000092	
226	11/16/2023	Bodycam Footage with Phone call to Turay	JDean-TempePD-000093	JDean-TempePD-000093	
227	11/16/2023	Tempe Police Body Cam Footage	JDean-TempePD-000094	JDean-TempePD-000094	
228	Undated	Tempe Police Interview Room Footage	JDean-TempePD-000095	JDean-TempePD-000095	
229	11/15/2023	Bodycam footage of Dean's phone	JDean-TempePD-000096	JDean-TempePD-000096	
230	Undated	CCTV footage of police interview with dean in hotel	JDean-TempePD-000098	JDean-TempePD-000098	
231	Undated	CCTV hotel entry footage	JDean-TempePD-000099	JDean-TempePD-000099	
232	Undated	CCTV parking lot footage	JDean-TempePD-000100	JDean-TempePD-000100	
233	Undated	CCTV parking lot footage	JDean-TempePD-000101	JDean-TempePD-000101	
234	Undated	CCTV front desk footage	JDean-TempePD-000102	JDean-TempePD-000102	
235	Undated	Tempe Police Cam Footage	JDean-TempePD-000103	JDean-TempePD-000103	
236	Undated	CCTV parking lot footage	JDean-TempePD-000104	JDean-TempePD-000104	
237	Undated	CCTV parking lot footage	JDean-TempePD-000105	JDean-TempePD-000105	
238	Undated	CCTV parking lot / hotel entry footage	JDean-TempePD-000106	JDean-TempePD-000106	
239	Undated	CCTV Footage (no native in folder)	JDean-TempePD-000107	JDean-TempePD-000107	
240	Undated	CCTV Footage (no native in folder)	JDean-TempePD-000108	JDean-TempePD-000108	
241	Undated	CCTV lawn footage	JDean-TempePD-000109	JDean-TempePD-000109	
242	Undated	CCTV hotel sidewalk footage	JDean-TempePD-000110	JDean-TempePD-000110	
243	Undated	CCTV hotel sidewalk footage	JDean-TempePD-000111	JDean-TempePD-000111	
244	11/15/2023	Bodycam footage of interview with Dean	JDean-TempePD-000112	JDean-TempePD-000112	
245	11/15/2023	Bodycam footage of interview with hotel clerk.	JDean-TempePD-000113	JDean-TempePD-000113	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
246	Undated	Tempe PD Body Cam Footage of report filing	JDean-TempePD-000114	JDean-TempePD-000114	
247	Undated	Tempe PD Audio Footage with Dean re work	JDean-TempePD-000115	JDean-TempePD-000115	
248	Undated	Tempe Police Audio (Jaylynn Dean)	JDean-TempePD-000116	JDean-TempePD-000116	
249	Undated	Tempe Police Audio (Driver H. Turay)	JDean-TempePD-000117	JDean-TempePD-000117	
250	Undated	Tempe Police Audio (Jaylynn Dean)	JDean-TempePD-000118	JDean-TempePD-000118	
251	7/8/2025	Tempe PD Audio Footage Dean call to Lopez	JDean-TempePD-000119	JDean-TempePD-000119	
252	7/8/2025	Tempe PD Audio Footage Hasan call to Lopez re Apple Maps	JDean-TempePD-000120	JDean-TempePD-000120	
253	7/8/2025	CCTV hotel cafeteria footage	JDean-TempePD-000121	JDean-TempePD-000121	
254	Undated	Tempe Police Cam Footage (Hotel Entrance)	JDean-TempePD-000122	JDean-TempePD-000122	
255	Undated	Tempe Police Audio	JDean-TempePD-000123	JDean-TempePD-000123	
256	Various	Dean medical records obtained from West Texas Physical Therapy Medical Records	JDean-WTPT-000001	JDean-WTPT-000014	
257	Various	Dean medical records obtained Hims & Hers Health	Only-JDean-H&HH-000001	Only-JDean-H&HH-000012	
258	6/14/2023	Uber U.S. Terms of Use	UBER-MDL3084-000013294	UBER-MDL3084-000013319	
259	Various	Driver / Rider Communication Log	UBER-MDL3084-BW-00000015	UBER-MDL3084-BW-00000015	
260	Various	Uber Deals Communication Log	UBER-MDL3084-BW-00000017	UBER-MDL3084-BW-00000017	
261	12/26/2016-11/15/2023	H. Turay Feedback and Ratings Spreadsheet	UBER-MDL3084-BW-00006259	UBER-MDL3084-BW-00006259	
262	11/11/2023-12/20/2024	J. Dean Feedback and Ratings Spreadsheet	UBER-MDL3084-BW-00006290	UBER-MDL3084-BW-00006290	
263	11/14/2023	Driver H. Turay Location Log	UBER-MDL3084-BW-00006299	UBER-MDL3084-BW-00006299	
264	11/15/2023	Jaylynn Dean Status and Flow	UBER-MDL3084-BW-00006330	UBER-MDL3084-BW-00006330	
265	10/11/2023	Uber Community Guidelines	UBER-MDL3084-BW-00036699	UBER-MDL3084-BW-00036699	
266	4/20/2023	Driver H. Turay Communication with Uber re: Account Suspension	UBER-MDL3084-BW-00008634	UBER-MDL3084-BW-00008635	
267	Various	Driver H. Turay Status and Flow	UBER-MDL3084-DFS00003652	UBER-MDL3084-DFS00003652	
268	11/17/2023	Email from Uber Public Safety Response Team re: J. Dean and H. Turay Info	UBER-MDL3084-DFS00003673	UBER-MDL3084-DFS00003675	
269	5/9/2024	LERT/Litigation Cross-Reference Chart	UBER-MDL3084-DFS00003676	UBER-MDL3084-DFS00003676	
270	11/15/2023	Trip Incident Details Requested by A. Cordova	UBER-MDL3084-DFS00003677	UBER-MDL3084-DFS00003677	
271	11/17/2023	Trip Incident Information and GPS Details Spreadsheet	UBER-MDL3084-DFS00003678	UBER-MDL3084-DFS00003678	
272	11/15/2023	AZ Search Warrant for H. Turay	UBER-MDL3084-DFS00003679	UBER-MDL3084-DFS00003681	
273	11/15/2023	Trip Incident Details Requested by A. Cordova	UBER-MDL3084-DFS00003682	UBER-MDL3084-DFS00003682	
274	11/15/2023	Driver H. Turay Status and Flow	UBER-MDL3084-DFS00003683	UBER-MDL3084-DFS00003683	
275	1/7/2023	Uber Written Communication with H. Turay re Rider Feedback	UBER-MDL3084-DFS00003687	UBER-MDL3084-DFS00003687	
276	1/24/2019	Rider Communication with Uber re: Unprofessional Complaint	UBER-MDL3084-DFS00003688	UBER-MDL3084-DFS00003688	
277	7/16/2018	Rider Communication with Uber re: Safety Complaint	UBER-MDL3084-DFS00003689	UBER-MDL3084-DFS00003689	
278	4/18/2023	Rider Communication with Uber re: Safety and Discrimination Complaint	UBER-MDL3084-DFS00003690	UBER-MDL3084-DFS00003691	
279	4/18/2023	Uber Written Communication with H. Turay re: Account Hold	UBER-MDL3084-DFS00003692	UBER-MDL3084-DFS00003693	
280	4/4/2023	Rider Communication with Uber re Safety Agent Contact	UBER-MDL3084-DFS00003694	UBER-MDL3084-DFS00003695	
281	3/24/2019	Uber Written Communication with H. Turay re: Rider Feedback	UBER-MDL3084-DFS00003696	UBER-MDL3084-DFS00003696	
282	11/15/2023	Uber Written Communication with J. Dean re: Following Up on Safety Incident	UBER-MDL3084-DFS00003699	UBER-MDL3084-DFS00003700	
283	11/15/2023	Uber Written Communication with H. Turay re: Account Restriction and Permanent Deactivation	UBER-MDL3084-DFS00003701	UBER-MDL3084-DFS00003701	
284	4/5/2023	Uber Written Communication with H. Turay re: Car Description Mismatch	UBER-MDL3084-DFS00003702	UBER-MDL3084-DFS00003703	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
285	1/9/2023	Rider Communication with Uber re Vehicle Safety	UBER-MDL3084-DFS00003705	UBER-MDL3084-DFS00003706	
286	1/7/2023	Uber Written Communication with H. Turay re: Safety Complaint	UBER-MDL3084-DFS00003707	UBER-MDL3084-DFS00003707	
287	1/7/2023	Rider Communication with Uber re: Safety Complaint	UBER-MDL3084-DFS00003708	UBER-MDL3084-DFS00003708	
288	1/7/2023	Uber Follow Up Communication with Rider re: Safety Complaint	UBER-MDL3084-DFS00003709	UBER-MDL3084-DFS00003709	
289	4/18/2023	Uber Incident Report	UBER-MDL3084-DFS00003711	UBER-MDL3084-DFS00003716	
290	11/15/2023	Uber Incident Report	UBER-MDL3084-DFS00003727	UBER-MDL3084-DFS00003733	
291	12/7/2023	Uber Incident Report	UBER-MDL3084-DFS00003737	UBER-MDL3084-DFS00003740	
292	Undated	Uber Phone Call with H. Turay re: April 17 Safety Complaint	UBER-MDL3084-DFS00003741	UBER-MDL3084-DFS00003741	
293	11/15/2023	Jaylynn Dean Phone Conversation with Uber re: Sexual Misconduct report	UBER-MDL3084-DFS00024083	UBER-MDL3084-DFS00024083	
294	11/15/2023	Jaylynn Dean / H. Turay Ride Timestamps and Location	UBER-MDL3084-DFS00144608	UBER-MDL3084-DFS00144608	
295	11/15/2023	Jaylynn Dean Call re:port with Uber re: Sexual Misconduct re:port	UBER-MDL3084-DFS00144609	UBER-MDL3084-DFS00144611	
296	4/2/2025	Jaylynn Dean Phone Conversation with Uber re: Sexual Misconduct report	UBER-MDL3084-DFS00144612	UBER-MDL3084-DFS00144612	
297	4/22/2025	Driver H. Turay Incident Report Log	UBER-MDL3084-DFS00159600	UBER-MDL3084-DFS00159600	
298	4/14/2023	Uber Communication with Kevin re: Complaint about Driver	UBER-MDL3084-DFS00159661	UBER-MDL3084-DFS00159663	
299	1/7/2023	Uber Follow Up Communication with Rider re: Safety Complaint	UBER-MDL3084-DFS00159664	UBER-MDL3084-DFS00159665	
300	4/11/2023	Uber Communication with Kevin re: Complaint about Driver	UBER-MDL3084-DFS00159666	UBER-MDL3084-DFS00159668	
301	4/18/2023	Driver H. Turay Communication with Uber re: Account Suspension	UBER-MDL3084-DFS00159669	UBER-MDL3084-DFS00159671	
302	4/20/2023	Driver H. Turay Call Report with Uber	UBER-MDL3084-DFS00159672	UBER-MDL3084-DFS00159673	
303	4/4/2023	Uber Follow Up Communication with Rider re: Safety Agent Contact	UBER-MDL3084-DFS00159674	UBER-MDL3084-DFS00159676	
304	4/22/2025	Driver H. Turay Phone Conversation with Uber re: Account Suspension	UBER-MDL3084-DFS00159678	UBER-MDL3084-DFS00159678	
305	3/24/2019	Uber Communication to Driver H. Turay re: Behavior Expectations	UBER-MDL3084-DFS00159679	UBER-MDL3084-DFS00159679	
306	4/13/2023	Uber Complaint re:port re: Kevin	UBER-MDL3084-DFS00159683	UBER-MDL3084-DFS00159685	
307	4/14/2023	Uber Communication with Kevin re: Complaint about Driver	UBER-MDL3084-DFS00159686	UBER-MDL3084-DFS00159687	
308	1/7/2023	Uber Communication with Driver H. Turay re: Rider Complaint	UBER-MDL3084-DFS00159689	UBER-MDL3084-DFS00159690	
309	1/9/2023	Rider Communication with Uber re: Vehicle Safety	UBER-MDL3084-DFS00159692	UBER-MDL3084-DFS00159694	
310	1/7/2023	Uber Communication with Driver H. Turay re: Rider Complaint	UBER-MDL3084-DFS00159695	UBER-MDL3084-DFS00159696	
311	1/7/2023	Rider Communication with Uber re: Safety Complaint	UBER-MDL3084-DFS00159697	UBER-MDL3084-DFS00159698	
312	7/16/2018	Rider Communication with Uber re: Safety Complaint	UBER-MDL3084-DFS00159699	UBER-MDL3084-DFS00159700	
313	11/15/2023	Uber Communication with Driver H. Turay re: Temporary Account re:striction	UBER-MDL3084-DFS00159709	UBER-MDL3084-DFS00159709	
314	11/15/2023	Uber Incident Report	UBER-MDL3084-DFS00159710	UBER-MDL3084-DFS00159716	
315	6/26/2025	Jaylynn Dean Lyft Profile	UBERMDLPRODUCTION_00001	UBERMDLPRODUCTION_00006	
316	4/16/2025	JD Lyft Profile	UBERMDLPRODUCTION_00007	UBERMDLPRODUCTION_00012	
317	Various	Lyft Ride History Spreadsheet	UBERMDLPRODUCTION_00013	UBERMDLPRODUCTION_00014	
318	Various	CHECKR Background Report for Driver H. Turay	Various	Various	
319	Various	Hire Right Report for Driver H. Turay	Various	Various	
320	Various	CHECKR Uber Account on Hold	Various	Various	
321	Various	Dean Medical Records from Amarillo Pediatric Clinic	Various	Various	
322	11/2023	Text messages with Dean (Peterson Dep. Ex. 1)	BW-DEAN_JAYLYNN_000086	BW-DEAN_JAYLYNN_000088	
323	11/15/2023	Text message exchanges with Jaylynn (Gregg Dep. Ex. 4)	BW-DEAN_Elisa_Gregg_000001	BW-DEAN_Elisa_Gregg_000001	
324	11/15/2023	Tempe Police Department General Offense Report - Investigative Narrative of sexual assault (Turay Dep. Ex. 6)	BW-DEAN_JAYLYNN_000026	BW-DEAN_JAYLYNN_000031	
325	Undated	Screenshots of driver Hassan on iPhone screen (Peterson Dep. Ex. 4)	BW-DEAN-Jade_Peterson_00001	BW-DEAN-Jade_Peterson_00002	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
326	3/25/2019	In-app support Incident Chat with agent and customer (Jennifer) titled "My driver was rude" - Escalated to IIT (Turay Dep. Ex. 3)	UBER-MDL3084-DFS00216676	UBER-MDL3084-DFS00216677	
327	Undated	Exhibit 17 slipsheet for audio file (Dean Dep. Ex. 17)	UBER-MDL3084-DFS00144612	UBER-MDL3084-DFS00144612	
328	Undated	Exhibit 16 slipsheet for audio file (Dean Dep. Ex. 16)	N/A	N/A	
329	Undated	John Chandler CV	N/A	N/A	
330	2/28/2025	Data Insights Invoices (February - October 2025) (Chandler Dep. Ex. 3)	N/A	N/A	
331	Undated	Digital Marketing Insights: The Long Road to Conversion - The Digital Purchase Funnell by Andrew Martin, Microsoft's Atlas Institute (Chandler Dep. Ex. 6)	N/A	N/A	
332	Undated	Excerpt from Chandler Report (page 77) Chart of reported incidents vs Actual chart from 2019-202 US Safety Report showing decrease in reports (Chandler Dep. Ex. 9)	N/A	N/A	
333	Undated	Demonstrative: Lyft Rate of 5 Most Serious Categories of Sexual Assault is 25% Higher Than Uber (Chandler Dep. Ex. 13)	N/A	N/A	
334	Undated	Publication: A Bayesian Model of Underreporting for Sexual Assault on College Campuses (The Annals of Applied Statistics 2024, Vol. 18, No. 4, 3146-3164) (Chandler Dep. Ex. 14)	N/A	N/A	
335	Undated	Exemplar Entries from Wave 1 Plaintiffs' Communications Logs (Chandler Dep. Ex. 15)	N/A	N/A	
336	8/25/2025	Communications Summary (Named Plaintiffs) (Chandler Dep. Ex. 16)	N/A	N/A	
337	8/6/2025	Chart from Uber News: Uber's Record on Safety is Clear, written by Hannah Nilles with columns entitled "Platform Access" "Features & Technology" "Support & Response" and "Expert Partnerships, Transparency & Reporting" (Chandler Dep. Ex. 17)	N/A	N/A	
338	Various	All invoices prepared by John Chandler, or anyone on his behalf, in the matter of In re Uber Technologies Inc., Passenger Sexual Assault Litigation	N/A	N/A	
339	8/4/2025	Minette Drumwright CV	N/A	N/A	
340	Undated	Fee for Services - Activity of services provided June 2025-September 2025 (Drumwright Dep. Ex. 2)	N/A	N/A	
341	2012	Article titled PR Professionals as Organizational Conscience - Study by Marlene S. Neil and Minnette Drumwright (Drumwright Dep. Ex. 3)	N/A	N/A	
342	Undated	PowerPoint Presentation - Safety Over the Years, illustrating steps taken to improve the safety of Uber's platform (Drumwright Dep. Ex. 4)	UBER000026571 UBER_JCCP_MDL_000008096	UBER000026590 UBER_JCCP_MDL_000008115	
343	Undated	Jay Feldis CV	N/A	N/A	
344	6/13/2025	Invoices from Rare Panda Inc to WHB re John Feldis expert services (Feldis Dep. Ex. 3-8)	N/A	N/A	
345	Undated	Westlaw doc - A.R.S. § 28-9507 § 28-9507. Vehicles for hire; criminal background checks; vehicle safety records; zero-tolerance policy; drug and alcohol use by driver; passenger complaints (Feldis Dep. Ex. 10)	N/A	N/A	
346	Undated	American Legal Publishing SEC. 1113. TAXI AND RAMP TAXI EQUIPMENT REQUIREMENTS. (Feldis Dep. Ex. 12)	N/A	N/A	
347	1/2025	Robert Johnson CV	N/A	N/A	
348	8/21/2025	Robert W. Johnson & Associates Invoice to R. Abrams (PW) for Punitive Damages Analysis (Johnson Dep. Ex. 11)	N/A	N/A	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
349	Undated	Lacey Keller CV		N/A	
350	1/22/2021	Article from FreedomFoundation.com titled Seiu Has a Sexual Predator Problem by S. Coleman (Keller Dep. Ex. 3)	N/A	N/A	
351	4/17/2018	New School Free Press article - Student Sues University Over Response to Sexual Misconduct by T. Diep (Keller Dep. Ex. 4)	N/A	N/A	
352	5/7/2018	News Desk article titled Four Women Accuse New York's Attorney General of Physical Abuse by J. Mayer and R. Farrow (Keller Dep. Ex. 5)	N/A	N/A	
353	12/7/2022	Statement from Attorney General James on Sexual Harassment Investigation - in response to the sexual harassment investigation into former Chief of Staff Ibrahim Khan (Keller Dep. Ex. 6)	N/A	N/A	
354	2024	One page titled Industries with a picture of a hand holding a card that reads "Damages for Sexual Assault Victims" from MK Analytics Inc. (Keller Dep. Ex. 7)	N/A	N/A	
355	2/10/2017	Email from T. Mitchell to K. McDonald re Findings & potential action items for S.A. (Keller Dep. Ex. 8)	UBER_JCCP_MDL_000356814	UBER_JCCP_MDL_000356817	
356	Various	All invoices prepared by Lacey Keller, or anyone on her behalf, in the matter of In re Uber Technologies Inc., Passenger Sexual Assault Litigation	N/A	N/A	
357	Undated	Mindy Mechanic CV	N/A	N/A	
358	Undated	Home Page of Mindy Mechanic website (Mechanic Dep. Ex. 1)	N/A	N/A	
359	Undated	Services Tab of Mindy Mechanic's website (Mechanic Dep. Ex. 2)	N/A	N/A	
360	8/24/2023	Instagram Messages (Mechanic Dep. Ex. 5)	BW-DEAN_JAYLYNN_S.M._000001	BW-DEAN_JAYLYNN_S.M._000248	
361	Various	Hims & Hers Health Records for Jaylynn Dean (Mechanic Dep. Ex. 6)	JDean-H&HH-000001	JDean-H&HH-000012	
362	4/12/2018	Life Events Checklist for DSM-5 (LEC-5) Interview Version (Mechanic Dep. Ex. 7)	N/A	N/A	
363	7/12/2025	MMPI Validity Test Scores (Mechanic Dep. Ex. 8)	N/A	N/A	
364	4/12/2018	Life Events Checklist fo DSM-5 (LEC-5) Extended Version (Mechanic Dep. Ex. 9)	N/A	N/A	
365	Various	All invoices prepared by Mindy Mechanic, or anyone on her behalf, in the matter of In re Uber Technologies Inc., Passenger Sexual Assault Litigation	N/A	N/A	
366	Undated	Appendix C: Fee Schedule 2025 for Sophic Synergistics (Rando Dep. Ex. 1)	N/A	N/A	
367	8/7/2025	Invoices from Sophic Synergistics for services March - October 2025 (Rando Dep. Ex. 3)	N/A	N/A	
368	Undated	Cynthia M. Rando CV (Rando Dep. Ex. 4)	N/A	N/A	
369	Undated	Risk management - Guidelines (International Standard ISO 31000 - Second Edition 2018-2) (Rando Dep. Ex. 7)	N/A	N/A	
370	Undated	ISO Resources: Foreward - Supplementary information (Rando Dep. Ex. 8)	N/A	N/A	
371	Undated	Systems and software engineering — Life cycle processes — Risk management (International Standard ISO/IEC/IEEE 16085 - First Edition 2021-01) (Rando Dep. Ex. 9)	N/A	N/A	
372	8/1/2013	Usability of consumer products and products for public use —Part 2: Summative test method (Technical Specification ISO/TS 20282-2, Second Edition 2013-08-01) (Rando Dep. Ex. 12)	N/A	N/A	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
373	11/0/2018	Analysis of Rider-to-Driver Feedback Tags (US only) November 2018 PowerPoint (Rando Dep. Ex. 13)	UBER_JCCP_MDL_003273474	UBER_JCCP_MDL_003273560	
374	1/15/2025	Human Factor Assessment Lemiah Johnson vs. Iris Development, LLC et al. (Rando Dep. Ex. 15)	N/A	N/A	
375	4/24/2023	Clark v. Be A Champion Fuel Food Service, LLC, 2023 WL 7491660 - Report or Affidavit of Cynthia M. Rando (Rando Dep. Ex. 16)	N/A	N/A	
376	Various	All invoices prepared by Cynthia Rando, or anyone on her behalf, in the matter of In re Uber Technologies Inc., Passenger Sexual Assault Litigation	N/A	N/A	
377	6/2025	Thomas Tremblay CV	N/A	N/A	
378	2/28/2006	The Vermont Cynic article titled Number of Vermont Sex Offenders Keeps Growing (Tremblay Dep. Ex. 4)	N/A	N/A	
379	9/1/2025	Invoice from Tremblay Consulting & Training to Simmons Hanly Conroy for expert fees (Tremblay Dep. Ex. 8-9, 18-19)	N/A	N/A	
380	8/28/2025	Article titled How to TALK with Survivors of Sexual Violence - RAINN (last updated 8/28/2025) (Tremblay Dep. Ex. 21)	N/A	N/A	
381	5/30/2024	RAINN Facebook page video re sexual assault survivors showing chat thread with Bravestone Project and Natalie Wagner (Tremblay Dep. Ex. 22)	N/A	N/A	
382	12/6/2019	FoxBusiness Article by Audrey Conklin titled Uber commended for new safety report (Tremblay Dep. Ex. 23)	N/A	N/A	
383	Undated	Chief Thomas R. Tremblay (Ret) Consultant/Instructor Biography from www.tomtremblauconsulting.com (Tremblay Dep. Ex. 24)	N/A	N/A	
384	02/2020	EVAWI Model Policy Resource: Law Enforcement Sexual Misconduct Prevention and Accountability by Chief T. Tremblay (Ret.), Sgt. J. Archambault (Ret.), K. Lonsway, PhD (Tremblay Dep. Ex. 25)	N/A	N/A	
385	6/9/2025	USDOJ, Ofc of Justice Programs, Bureau of Justice Statistics article - Criminal Victimization, 2023 by S. N. Tapp, J. Coen - September 2024, NCJ 309335 (Revised 6/9/2025) (Tremblay Dep. Ex. 26)	N/A	N/A	
386	2025	Uber Law Enforcement and Public Health Portal webpage - Public safety response portal (Tremblay Dep. Ex. 27)	N/A	N/A	
387	4/2020	Article by K.M. Glenn of Criminal Justice Know How - The Crime Prevention Triangle (Tremblay Dep. Ex. 28)	N/A	N/A	
388	Undated	Veronique Valliere CV	N/A	N/A	
389	11/17/2023	Letter from Public Safety Response Team to A. Cordova in response to request seeking information (Valliere Dep. Ex. 1)	UBER-MDL3084-0FS00003673	UBER-MDL3084-0FS00003675	
390	11/16/2023	Page titled Task Information, Created By S. Flores, TLDR - LE reached out with questions, Primary Topic: Enhanced Safety Support, Associated Factor, Sexual Assault (Valliere Dep. Ex. 2)	UBER-MDL3084-BW-00011925	UBER-MDL3084-BW-00011925	
391	11/2019	Safety Report - National Third Parties & NGOs (Valliere Dep. Ex. 3)	UBER000144215 UBER_JCCP_MDL_000124113	UBER000144215.0004 UBER_JCCP_MDL_000124113.0004	
392	12/5/2019	Email thread from B. Anderson to J. Kawada Page re advocates' statements (Valliere Dep. Ex. 4)	UBER_JCCP_MDL_000394403	UBER_JCCP_MDL_000394407	
393	12/8/2016	Uber Community Guidelines - Last updated 12/8/2016 (Valliere Dep. Ex. 5)	UBER-MDL3084-000366787	N/A	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
394	Undated	Screenshot of excerpt from "Unmasking the Sexual Offender" book authored by Valliere (Valliere Dep. Ex. 6)	N/A	N/A	
395	Undated	Valliere, Veronique, Understanding the Non-Stranger Rapist (Valliere Dep. Ex. 7)	N/A	N/A	
396	Undated	Screenshot of "Unmasking the Sexual Offender" book authored by Valliere (Valliere Dep. Ex. 8)	N/A	N/A	
397	10/23/2025	RAINN - Facts and Statistics: The Scope of the Problem (Valliere Dep. Ex. 9)	N/A	N/A	
398	12/6/2019	Chat between Gus@uber and Sarfraz@uber (Valliere Dep. Ex. 12)	UBER_JCCP_MDL_000208845 UBER000228068	UBER_JCCP_MDL_000208850 UBER000228073	
399	Undated	Screenshot of excerpt from "Unmasking the Sexual Offender" book authored by Valliere (Valliere Dep. Ex. 16)	N/A	N/A	
400	Undated	Google maps pictures of 732 W. Turner St. (Valliere Dep. Ex. 18)	N/A	N/A	
401	Various	All invoices prepared by Veronique Valliere, or anyone on her behalf, in the matter of In re Uber Technologies Inc., Passenger Sexual Assault Litigation	N/A	N/A	
402	Undated	Bruce Weiner CV	N/A	N/A	
403	Undated	Weiner LinkedIn Profile page (Weiner Dep. Ex. 3)	N/A	N/A	
404	10/16/2025	Snapshot of the Weiner.net webpage captured by The Wayback Machine (Weiner Dep. Ex. 4)	N/A	N/A	
405	2024	SEAK, Inc. directory page showing contact info, specialties & experience and additional information for Bruce Weiner, Expert Witness (Weiner Dep. Ex. 5)	N/A	N/A	
406	5/31/2025	Invoice from Weiner.net, LLC to Uber MDL Plaintiff Counsel, R. Adams, for expert services (Weiner Dep. Ex. 6)	N/A	N/A	
407	8/28/2025	Safety Features - M. Esteves Deposition Aid (Weiner Dep. Ex. 9)	N/A	N/A	
408	10/28/2025	US Lyft Help/Submit a request form- Something happened during my ride (Weiner Dep. Ex. 14)	N/A	N/A	
409	3/10/2024	Sarah Kauffman CV	N/A	N/A	
410	5/2025	Joseph Okpaku CV	N/A	N/A	
411	9/2025	Eric Piza CV	N/A	N/A	
412	7/23/2025	Victoria Stodden CV	N/A	N/A	
413	10/24/2025	Expert Report of Victoria Stodden - Tables contained within the report	N/A	N/A	
414	5/2025	Chris Wilson CV	N/A	N/A	
415	2025	Kristen Zgoba CV	N/A	N/A	
416	1/1/2025	Iain Mcintyre CV	N/A	N/A	
417	Undated	Vida Thomas CV	N/A	N/A	
418	Undated	Jason Morris CV	N/A	N/A	
419	4/30/2025	Jaylynn Dean's Rule 26 Disclosure with attached Exhibits A and B	N/A	N/A	
420	8/8/2025	Jaylynn Dean's Supplementary Rule 26 Disclosure	N/A	N/A	
421	5/24/2024	Plaintiff Fact Sheet	N/A	N/A	
422	8/6/2024	First Amended Plaintiff Fact Sheet	JDean-PFS-000001	JDean-PFS-000020	
423	1/3/2025	Second Amended Plaintiff Fact Sheet	N/A	N/A	
424	1/28/2025	Third Amended Plaintiff Fact Sheet	N/A	N/A	
425	4/18/2025	Fourth Amended Plaintiff Fact Sheet	N/A	N/A	
426	8/14/2025	Fifth Amended Plaintiff Fact Sheet	N/A	N/A	

*Exhibit #	Date	Description	Begin Bates	End Bates	Subject to Stipulation
427	8/15/2025	Sixth Amended Plaintiff Fact Sheet	N/A	N/A	
428	4/14/2025	Plaintiff Jaylynn Dean Response & Objections to Defendant Uber's Interrogatories, Set One	N/A	N/A	
429	6/3/2025	Plaintiff Jaylynn Dean's First Supplemental Responses to Defendant Uber Interrogatories	N/A	N/A	
430	6/17/2025	Plaintiff Jaylynn Dean's Second Supplemental Responses to Defendant Uber Interrogatories	N/A	N/A	
431	7/16/2025	Plaintiff Jaylynn Dean's Response & Objections to Defendant Uber's Request for Admissions Set One	N/A	N/A	
432	7/16/2025	Plaintiff Jaylynn Dean's Third Supplemental Responses to Defendant Uber Interrogatories	N/A	N/A	
433	7/16/2025	Plaintiff Jaylynn Dean's Response & Objections to Defendant Uber's Interrogatories, Set Two	N/A	N/A	
434	9/25/2025	Plaintiff Jaylynn Dean's Responses & Objections to Defendant Uber's Requests for Admissions, Set One	N/A	N/A	
435	9/25/2025	Plaintiff Jaylynn Dean's Responses & Objections to Defendant Uber's Interrogatories, Set Three	N/A	N/A	
436	12/4/2025	Declaration of Todd Gaddis	N/A	N/A	
437	Undated	All documents identified by Plaintiff on their trial exhibit list	N/A	N/A	
438	Undated	All exhibits used in depositions designated by Plaintiff	N/A	N/A	
439	Undated	Demonstratives	N/A	N/A	
440	Undated	Scientific, medical, and statistical literature, periodicals, and other learned treatises pursuant to FRE 803 (18)	N/A	N/A	
441	Undated	All audio and video produced by law enforcement in this case	N/A	N/A	